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EXPERIAN INFORMATION SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 JANET PERKINS,
11 Plaintiff,
12 v.
13 EXPERIAN INFORMATION SOLUTIONS,
14 INC.; ET AL.,
15 Defendants.

Case No. 3:16-cv-06347-MMC

Assigned to: Judge Maxine M. Chesney

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

18 Plaintiff Janet Perkins (“Plaintiff”) filed her Complaint in this action on November 1,
19 2016 and served Defendant Experian Information Solutions (“Experian”) on November 22, 2016,
20 at the same time that Plaintiff’s attorney served numerous other complaints on Experian. Given
21 the large volume of complaints requiring a response from Experian at the same time, and in
22 accordance with Local Rule 6-1(a), Plaintiff and Experian have agreed to an extension for
23 Experian to answer or otherwise respond to the Complaint to February 1, 2017. To the extent that
24 Experian files a motion to dismiss in this case, for the same considerations, Experian agrees that
25 Plaintiff shall have 30 days to respond. Experian will thereupon have 21 days for any reply.

26 Accordingly, IT IS HEREBY STIPULATED by and between Plaintiff and Experian, that
27 the deadline for Experian to answer or otherwise respond to the Complaint is extended until
28 February 1, 2017, Plaintiff's deadline to respond to any motion to dismiss is extended to 30 days

1 from filing, and Experian's deadline to reply in support of a motion to dismiss is extended to 21
2 days from filing the opposition.

3

4 Dated: December 5, 2016

/s/ Elliot W. Gale

5 Elliot W. Gale (SBN 263326)
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12 Attorneys for Plaintiff
13 Janet Perkins

14

15 Dated: December 5, 2016

/s/ Valerie McConnell

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24 Experian Information Solutions, Inc.

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ECF CERTIFICATION

26

I, Valerie McConnell, hereby attest pursuant to N.D. Cal. General Order No. 45 that the
27 concurrence to the filing of this document has been obtained from each signatory hereto.

28

Executed this 5th day of December, 2016, at Palo Alto, California.

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/s/ Valerie McConnell

31 Valerie McConnell (State Bar No. 274159)
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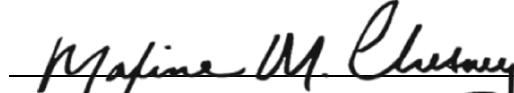
39 Attorneys for Defendant
40 Experian Information Solutions, Inc.

1 **[PROPOSED] ORDER**

2 The Court, having considered the parties' Joint Stipulation for Extension of Time to
3 **extends** Respond to the Complaint, hereby **Extend** Experian Information Solutions, Inc.'s
4 answer or otherwise respond to the Complaint to February 1, 2017.

5 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.** It is further ordered that, in
6 the event a motion to dismiss is filed, the parties' proposed briefing schedule shall apply.

7 DATED: December 6, 2016

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9 The Honorable Maxine M. Chesney

10 United States District Judge

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